

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: § **Chapter 11**

FIELDWOOD ENERGY LLC, et al., § **Case No. 20-33948 (MI)**

Debtors.¹ § **(Jointly Administered)**

BP EXPLORATION & PRODUCTION INC.'S WITNESS AND EXHIBIT LIST

BP Exploration & Production Inc. (“BP”) files this Witness and Exhibit List identifying those individuals that may be called as witnesses and exhibits that may be introduced at the emergency hearing on the Debtors’ *Emergency Motion to Compel BP Exploration & Production Inc. to Perform Pre-Petition Contracts* [Docket No. 792], scheduled for February 2, 2021, at 3:00 p.m. (prevailing Central Time) (the “Hearing”).

A. WITNESSES

In connection with the Hearing, BP may call any one or more of the following individuals to provide testimony:

1. Kamil Gurses, Senior Finance Manager – Na Kika/OBO, BP Americas Inc.;
2. Craig Redding, Project Manager, BP;
3. Danielle Scott, CPL, Business Partner-Land, BP Exploration and Production Inc.;
4. Luis Aguilar, Area Production Manager, BP;
5. Any witness necessary to authenticate a document;
6. Any witness designated or called by any other party; and

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

7. Any impeachment or rebuttal witness.

B. EXHIBITS

In connection with the Hearing, BP may seek to introduce into evidence any one or more of the following documents:

Ex. #	Description	Offered	Obj.	Admitted	Disposition
1.	Loop Subsea Production System Construction and Operating Agreement dated December 21, 2011 [Filed Under Seal]				
2.	Production Handling and Operating Services Agreement dated September 21, 2010 [Filed Under Seal]				
3.	Tieback Letter Agreement dated October 3, 2019 [Filed Under Seal]				
4.	Satellite Well System Letter Agreement dated January 28, 2020				
5.	LSPS Update October 2020 [Filed Under Seal]				
6.	BP Letter dated November 6, 2020				
7.	Email string dated December 3, 2020				
8.	BP's Letter dated December 10, 2020				
9.	BP's Letter dated December 15, 2020				
10.	Department of the Interior Submittal ID 187447650 Report dated December 17, 2020				
11.	LSPS Update December 2020 [Filed Under Seal]				
12.	Fieldwood Letter dated December 24, 2020				
13.	BP's Letter dated June 12, 2020				
14.	BP's Response dated January 11, 2021				

Ex. #	Description	Offered	Obj.	Admitted	Disposition
15.	Draft Sole Benefit and LSPS Loop Reinstatement Agreement [Filed Under Seal]				
16.	LSPS Update January 2021 [Filed Under Seal]				
17.	Email string dated January 5, 2021				
18.	January 20, 2021 DOI Order				
19.	Revision 4 of Galapagos LSPS Response Corrective Action Plan [Filed Under Seal]				
20.	Email string, "MC 519 – SOP Activity Schedule," dated January 29, 2021 and attachment				
21.	Department of the Interior Submittal ID 196843060 Report dated February 1, 2021				
22.	Department of the Interior Submittal ID 196848967 Report dated February 1, 2021				
23.	Not used at this time				
24.	Biden Admin Issues 30+ Drilling Permits dated February 1, 2021				
25.	Any exhibit designated by any other party;				
26.	Any pleadings, reports, or other documents filed in the Debtors' bankruptcy case; and				
27.	Any impeachment or rebuttal exhibits.				

BP reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing. BP also reserves the right to rely upon and use as evidence additional documents produced by the Debtors or any other party in interest.

Dated: February 2, 2021

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Shari L. Heyen

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Counsel for BP Exploration & Production Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 2, 2021, a true and correct copy of the foregoing Witness and Exhibit List was served by electronic mail via the Court's ECF system to all parties authorized to receive notice in this case.

By: /s/ Shari L. Heyen

Shari L. Heyen